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February 1, 2006

RECEIVED

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Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Federal Communications Commission  
Office of Secretary

Re: CC Docket 94-102  
E911 Quarterly Report  
Rural Cellular Corporation for itself and its affiliates

Dear Ms. Dortch:

On behalf of Rural Cellular Corporation and its subsidiaries<sup>1</sup> (collectively, "RCC") there is submitted herewith a report of the status of the company's implementation of E911 services.

RCC is a digital wireless carrier operating cellular radiotelephone and/or personal communications services in multiple markets. RCC is a Tier II carrier as defined in *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay, 2002 FCC LEXIS 3638, FCC 02-210 (2002) ("*Phase II Stay Order*"). This report is submitted in compliance with the terms of the *Phase II Stay Order*.

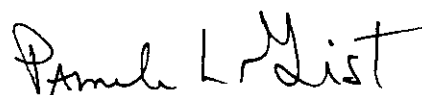
Pursuant to Sections 0.457(d) and 0.459 of FCC Rules, it is hereby requested that the information reported herein, in the narrative report and attached spreadsheet, be treated by the Commission as confidential, and be withheld from public inspection. The information, which would not customarily be released to the public, is confidential commercial information, and should be protected in accordance with Sections 0.457(d) and 0.459 of FCC Rules.

<sup>1/</sup> This report pertains to the following companies which are wholly-owned subsidiaries of Rural Cellular Corporation and are authorized by the FCC to provide broadband Commercial Mobile Radio Service: RCC Atlantic Licenses, LLC; RCC Minnesota, Inc.; Wireless Alliance, LLC and TLA Spectrum, L.L.C.

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Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,

A handwritten signature in black ink that reads "Pamela L. Gist". The signature is written in a cursive, flowing style.

Pamela L. Gist

# **Rural Cellular Corporation**

## **E911 Implementation Report**

### **February 1, 2006**

#### **Summary**

Rural Cellular Corporation ("Rural Cellular") operates wireless networks in rural communities in 14 states covering approximately 5.9 million people. RCC's service area encompasses 34 rural service areas, 3 metropolitan statistical areas and a few partitioned major and basic trading areas. Rural Cellular has deployed GSM and CDMA overlays in several markets, and continues to operate predominately its underlying TDMA/analog technology.

#### **Phase I**

Rural Cellular has made progress in the deployment of Phase I location capability services. For details on these deployments, please refer to the spreadsheet set forth in the Appendix to this report.

#### **Phase II**

Rural Cellular has also made progress in delivering Phase II services to public safety answering points. Rural Cellular continues to have concerns about the performance of network-based solutions in rural markets. Rural Cellular has elected a handset-based solution for all of its CDMA markets.

In addition to the network-based solution provided by Grayson Wireless, Rural Cellular has been deploying in certain TDMA and GSM networks an alternative network-based solution provided by Polaris Wireless.

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reason	Comments
137	Bibb County Communications Center	AL	Bibb	1	TDMA	6/29/2000			Y	12/5/2002			No data available on delays
142	Butler County Emergency Communications District	AL	Butler	1	TDMA	10/10/2000			Y	3/30/2003			No data available on delays
143	Calhoun County 9-1-1 District	AL	Calhoun	1	TDMA	9/4/2001			Y	11/1/2002			No data available on delays
145	Chambers County 9-1-1	AL	Chambers	1	TDMA	7/19/2000			Y	10/30/2002			No data available on delays
149	Chilton County E9-1-1 Center	AL	Chilton	1	TDMA	12/13/2000			Y	1/17/2003			No data available on delays
151	Choctaw County 9-1-1 Center	AL	Choctaw	1	TDMA	6/29/1999			Y	1/17/2003			No data available on delays
155	Clay County E9-1-1	AL	Clay	1	TDMA	7/20/2000			Y	1/17/2003			No data available on delays
157	Cleburne County 9-1-1 Center	AL	Cleburne	1	TDMA	2/25/2000			Y	10/31/2002			No data available on delays
175	Elba Police Department	AL	Coffee	1	TDMA	2/2/2001			Y	4/10/2003			No data available on delays
175	Elba Police Department	AL	Coffee	2	TDMA	2/11/2005			Y	1/10/2006			LIVE 1/10/06
175	Elba Police Department	AL	Coffee	2	GSM	2/11/2005			Y	1/10/2006			LIVE 1/10/06
177	Enterprise Police Department	AL	Coffee	1	TDMA	2/2/2001			Y	4/20/2004			No data available on delays
177	Enterprise Police Department	AL	Coffee	2	TDMA	2/11/2005			Y	1/10/2006			LIVE 1/10/06
177	Enterprise Police Department	AL	Coffee	2	GSM	2/11/2005			Y	1/10/2006			LIVE 1/10/06
182	Covington County 9-1-1	AL	Covington	1	TDMA	10/5/2004			Y	6/7/2005			RCC to contact PSAP to determine RFS status and ability to deploy with this PSAP. PSAP withdrew RFS. 4/8/05 PSAPs CPE format is not compatible with the Central Office's equipment/CPE vendor. 6/7/05 - PSAP LIVE
184	Crenshaw County Emergency Center	AL	Crenshaw	1	TDMA	2/2/2001			Y	3/20/2003			No data available on delays
188	Daleville Department of Public Safety	AL	Dale	2	TDMA	6/30/2004			Y	8/8/2004			No data available on delays
253	Ozark-Dale County E9-1-1	AL	Dale	2	TDMA	6/30/2004			Y	6/8/2004			No data available on delays
284	Selma-Dallas Communications Center	AL	Dallas	1	TDMA	11/3/1999			Y	12/5/2002			No data available on delays
184	Fayette County 9-1-1	AL	Fayette	1	TDMA	11/17/1999			Y	5/21/2003			No data available on delays
184	Fayette County 9-1-1	AL	Fayette	2	TDMA	11/17/1999			Y	11/3/2003			to get x/y fix.
266	Slocomb Police Department	AL	Geneva	1	TDMA	10/17/2000			Y	4/10/2003			No data available on delays
198	Greene County E-911 Communication District	AL	Greene	1	TDMA	7/8/2004			Y	4/6/2005			No data available on delays
201	Hale County E9-1-1	AL	Hale	1	TDMA	5/11/1999			Y	1/17/2003			No data available on delays
123	Abbeville Police Department	AL	Henry	2	TDMA	11/2/2005			N		4/28/06		Pending Cell Data
172	Dothan Police Department	AL	Houston	1	TDMA	6/30/2004			Y	11/24/2004			This PSAP was acquired from another carrier
217	Lamar County 9-1-1	AL	Lamar	1	TDMA	11/19/2000			Y	4/30/2003			No data available on delays
217	Lamar County 9-1-1	AL	Lamar	2	TDMA	11/19/2000			Y	8/2/2003			Phase 2 tested but no P2 location information available. Not enough cell sites in area to get x/y fix.
228	Lowndes County E9-1-1	AL	Lowndes	1	TDMA	1/25/2001			Y	1/24/2003			No data available on delays
231	Marengo County Emergency Communications District	AL	Marengo	1	TDMA	6/14/2000			Y	1/17/2003			No data available on delays
257	Pickens County Sheriff's Office	AL	Pickens	1	TDMA	7/17/2000			Y	1/17/2003			No data available on delays
275	Troy Police Department	AL	Pike	1	TDMA	5/12/2003			Y	7/17/2003			No data available on delays
275	Troy Police Department	AL	Pike	2	TDMA	10/24/2005			N		4/21/06		Pending PDE vendor readiness
261	Randolph County E9-1-1	AL	Randolph	1	TDMA	3/1/2001			Y	1/17/2003			No data available on delays
261	Randolph County E9-1-1	AL	Randolph	2	TDMA	7/18/2005			N		2/15/06	4	Pending PDE vendor readiness
261	Randolph County E9-1-1	AL	Randolph	2	GSM	7/18/2005			N		2/15/06	4	Pending PDE vendor readiness
268	Sumter County Sheriff's Office	AL	Sumter	1	TDMA	8/14/2000			Y	1/17/2003			No data available on delays
148	Childersburg Police Department	AL	Talladega	1	TDMA	7/9/1999			Y	7/31/2003			No data available on delays
226	Lincoln Police Department	AL	Talladega	1	TDMA	7/9/1999			Y	7/31/2003			No data available on delays
269	Sylacauga Police Department	AL	Talladega	1	TDMA	7/9/1999			Y	7/31/2003			No data available on delays
271	Talladega Police Department	AL	Talladega	1	TDMA	7/9/1999			Y	7/31/2003			No data available on delays
127	Alexander City Police Department	AL	Tallapoosa	1	TDMA	9/1/1999			Y	10/31/2003			No data available on delays
127	Alexander City Police Department	AL	Tallapoosa	2	TDMA	8/9/2004			Y	7/7/2005			7/7/05 PSAP LIVE
272	Tallapoosa County Sheriff's Office	AL	Tallapoosa	1	TDMA	9/1/1999			Y	10/31/2002			No data available on delays
272	Tallapoosa County Sheriff's Office	AL	Tallapoosa	2	TDMA	8/9/2004			Y	7/7/2005			7/7/05 PSAP LIVE
277	Tuscaloosa Police Department	AL	Tuscaloosa	1	TDMA	9/4/2001			Y	1/13/2003			No data available on delays
285	Wilcox County E9-1-1 Communications District	AL	Wilcox	1	TDMA	7/19/2000			Y	1/17/2003			No data available on delays
2729	Elba County Communications Center	KS	Elba	1	TDMA	12/14/2005			N		6/9/06		Pending PSAP Call Routing
2729	Elba County Communications Center	KS	Elba	2	TDMA	12/14/2005			N		6/9/06		Pending PSAP Call Routing
2729	Elba County Communications Center	KS	Elba	1	GSM	12/14/2005			N		6/9/06		Pending PSAP Call Routing
2729	Elba County Communications Center	KS	Elba	2	GSM	12/14/2005			N		6/9/06		Pending PSAP Call Routing
2736	Garden City Police Department	KS	Finney	1	TDMA	11/1/2005			N		4/28/06		Pending PSAP Call Routing
2736	Garden City Police Department	KS	Finney	2	TDMA	11/1/2005			N		4/28/06		Pending PSAP Call Routing
2736	Garden City Police Department	KS	Finney	1	GSM	11/1/2005			N		4/28/06		Pending PSAP Call Routing
2736	Garden City Police Department	KS	Finney	2	GSM	11/1/2005			N		4/28/06		Pending PSAP Call Routing
2733	Ford County Communications Center	KS	Ford	1	GSM	9/9/2005			N		3/1/06		Pending PSAP call routing. Network configuration cannot support triangulation. PSAP has agreed to Phase I service. Circuit orders delayed by LEC
2763	Kearney County Sheriff's Office	KS	Kearney	1	TDMA	10/26/2005			N		4/21/06		Pending PSAP Call Routing
2763	Kearney County Sheriff's Office	KS	Kearney	2	TDMA	10/26/2005			N		4/21/06		Pending PSAP Call Routing
2763	Kearney County Sheriff's Office	KS	Kearney	1	GSM	10/26/2005			N		4/21/06		Pending PSAP Call Routing
2763	Kearney County Sheriff's Office	KS	Kearney	2	GSM	10/26/2005			N		4/21/06		Pending PSAP Call Routing
2797	Logan - Gove County Emergency Management	KS	Logan	1	TDMA	11/2/2005			N		4/28/06		Pending PSAP Call Routing
2797	Logan - Gove County Emergency Management	KS	Logan	2	TDMA	11/2/2005			N		4/28/06		Pending PSAP Call Routing
2797	Logan - Gove County Emergency Management	KS	Logan	1	GSM	11/2/2005			N		4/28/06		Pending PSAP Call Routing

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